

# **EXHIBIT 193**

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION  
4

5 Civil Action No. 1:17-cv-02989-AT  
6

7 -----  
8 DONNA CURLING, et al.,

9 Plaintiffs,

10 vs.

11 BRAD RAFFENSPERGER, et al.,

12 Defendants.  
13 -----

14 VIDEOTAPED DEPOSITION OF  
15 JIL RIDLEHOOVER  
16

17 Tuesday, August 16, 2022  
18

19 Court Reporters:

20 LeShaundra Byrd (9:43 a.m. to 10:18 a.m.)

21 Felicia A. Newland, CSR (10:18 a.m. to 12:56 p.m.)  
22

1 employees, you relied on Dominion for that?

2 A Yeah. It was a Dominion guy.

3 Honestly, I don't remember his name.

4 Q And then some of that voting  
5 equipment would go out to precincts, right?

6 A Yes.

7 Q And who was responsible for taking  
8 that equipment out to a precinct?

9 A We had a lady at one time, she set --  
10 she would come in and set up the precincts. She  
11 would set them up herself. And then people would  
12 come and open the doors up and put their banners  
13 out and . . .

14 Q So -- and I just want to walk through  
15 a little bit. So you've got an election coming up,  
16 you've got to get all the equipment to the  
17 individual precincts where people are going to  
18 vote, right?

19 A Uh-huh.

20 Q Is that right?

21 A Yes.

22 Q Okay.

1 A Sorry.

2 Q That's all right. You have to give a  
3 "yes" or a "no."

4 A Oh, I'm sorry. Yes.

5 Q That's okay.

6 And do I remember right, there are  
7 six voting precincts in Coffee County. Does that  
8 sound right?

9 A Yes.

10 Q Okay.

11 A That's correct.

12 Q And so for that process you've to get  
13 the touchscreens out of the vault. Who would  
14 handle that?

15 A The tech did it the last time.

16 Q And the last time for you would have  
17 been the January 2021 runoff?

18 A Correct.

19 Q Because you left in February of 2021?

20 A Right.

21 Q So for that election, just taking  
22 that election for a moment, the Dominion tech came

1 in, went into the vault, pulled the MBD  
2 touchscreens out. Is that right?

3 A Correct.

4 Q And then who took those from your  
5 office to the six precincts?

6 A Honestly the last time, I do not  
7 remember who set them up.

8 Q What about the November 2020  
9 election, who took them?

10 A I honestly don't remember if it was  
11 Mandy or not.

12 Q And who is Mandy?

13 A Mandy Harper. She is who the County  
14 hired to set up the machines at all the precincts.

15 Q And what can you tell me about her?

16 A Nothing really. I mean, her husband  
17 is Rex. I mean, that's all I know about her.

18 Q Rex?

19 A Yeah.

20 Q And they contracted with the County  
21 to do the servers?

22 A She only did that one time. And I

1 want to say it was maybe the PPP. I could be wrong  
2 about that because she couldn't handle it.

3 Q And PPP is the presidential primary?

4 A Yes.

5 Q Okay.

6 A Yeah, presidential primary.

7 Q And that -- you're talking about the  
8 one in 2020, in June?

9 A Yes. I mean, like I said, I'm not --  
10 I'm just -- I could not be accurate. I'm not  
11 accurate about that. I'm just --

12 Q Okay.

13 A -- assuming it. I mean . . .

14 Q When you say that Mandy couldn't  
15 handle it, what -- what do you mean?

16 A I guess lifting all the machines  
17 and -- because you had extra shifts. You had the  
18 touchscreen, you had the printer, and then you had  
19 that big huge battery pack.

20 COURT REPORTER: He had the what?

21 THE WITNESS: Battery pack.

22

1 BY MR. CROSS:

2 Q So she was -- she was brought in to  
3 set this up for one election and it was just too  
4 much for her --

5 A Correct.

6 Q -- correct?

7 Okay. Did you know how she  
8 transported the machines from your office to the  
9 precincts?

10 A The County had those big huge cargo  
11 trailers, a cargo trailer built to put them in.

12 Q And she towed that behind a vehicle?

13 A No. One of the County men did. I  
14 don't remember who.

15 Q So for the election that she handled,  
16 she shows up. And who -- who physically moved the  
17 machines out of the vault into the trailer?

18 A She did.

19 Q And you guys had over a hundred  
20 touchscreen machines, right?

21 A I honestly do not know.

22 Q And she moved all of those herself

1           into the trailer?

2                   A       To my knowledge, yes.

3                   Q       Okay. And then who drove the vehicle  
4           with that trailer to the precinct?

5                   A       I do not remember.

6                   Q       Do you know -- was it your office  
7           that hired her or was it the County Election Board  
8           or who?

9                   A       I -- I don't know how she got hired.

10                  Q       Do you know whether, for example, a  
11           background check was performed on her?

12                  A       I have no clue.

13                  Q       So she would leave with the machines  
14           and take them off to the precincts?

15                  A       Correct.

16                  Q       And then is it your understanding  
17           that she was the person who would physically set  
18           them up at the precincts?

19                  A       Correct.

20                  Q       And was she also the person who  
21           bought them back?

22                  A       Correct.



1                   Q       Was she -- she carried all of those  
2       into the vault?

3                   A       Correct.

4                   Q       And at some point you guys replaced  
5       her with someone else?

6                   A       Yes. But I honestly do not know who.

7                   Q       Was it a man or a woman?

8                   A       I do not remember.

9                   Q       You don't remember anything about the  
10       person who replaced her?

11                  A       I do not.

12                  Q       The BMD touchscreens have -- are you  
13       aware that they have seals on them?

14                  A       Yes.

15                  Q       And some of those seals are metal.  
16       Is that right?

17                  A       You can get different types of seals.

18                  Q       That's metal or plastic?

19                  A       Uh-huh.

20                  Q       Yes?

21                  A       Yes. Sorry.

22                  Q       That's okay.

1 office to do that?

2 A Not that I'm aware of.

3 Q Okay. The Dominion system also uses  
4 additional equipment, like a printer, for example,  
5 right, that prints a ballot?

6 A Correct.

7 Q Was Mandy also responsible for taking  
8 all the associated equipment, like the printers,  
9 that would be used with the touchscreens?

10 A Correct.

11 Q So she took everything that had to be  
12 set up in a precinct for voting, she took that?

13 A Correct.

14 Q Including scanners?

15 A The huge big black --

16 Q The scanners that would go out to the  
17 precincts where the ballots would be scanned, she  
18 would take that to the --

19 A Yes, the big huge -- I called it, it  
20 looked like a trashcan.

21 Q It was a scanner that sat on top of a  
22 bin and people sometimes called it trashcans?

1                   A       Yes. And it was locked. There was a  
2       big huge lid and it was locked. And there was  
3       probably at least 15 seals that went all the way  
4       around it.

5                   Q       And similar to what we talked about  
6       on the touchscreens, did you ever see anyone  
7       inspect the seals on those bins either before they  
8       went out or after they came back from voting?

9                   A       I personally did not.

10                  Q       You personally didn't do it, but you  
11       also did not see anyone do it?

12                  A       Right. That doesn't mean it wasn't  
13       done.

14                  Q       Understood. Understood.  
15                            You and Ms. Hampton were the only two  
16       who worked in the Elections Office, right?

17                  A       Correct.

18                  Q       So if it wasn't you, fair to say it  
19       would have to be Ms. Hampton?

20                  A       Correct.

21                  Q       Ms. Ridlehoover, do I understand  
22       right, you are represented by two lawyers today,

1 A No, I did not.

2 Q Do you recall anything that you said  
3 to Ms. Hampton after she told you not to say  
4 anything?

5 A No, I don't.

6 Q Okay. Did the people being there  
7 that you -- that we've talked about particularly  
8 after Ms. Hampton told you to be quiet, did it  
9 raise any concerns for you, any red flags? Just  
10 yes or no.

11 A Yes, it did.

12 Q Did you ever speak with anyone --  
13 strike that.

14 Did you ever speak with anyone about  
15 this team coming in on January 7th of 2021, besides  
16 the conversation where Ms. Hampton asked you to be  
17 quiet?

18 A No.

19 Q So you recall ever telling anyone at  
20 all that these people had come into the office?

21 A No.

22 Q So not a family member? Not law

## CERTIFICATE OF NOTARY PUBLIC

I, FELICIA A. NEWLAND, CSR, the officer before whom a partial segment of the foregoing videotaped deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was not duly sworn by me, but by LeShaundra Byrd; that the testimony of said witness was taken by LeShaundra Byrd and me in stenotype and thereafter reduced to typewriting under my direction; that said deposition of the partial segment wherein LeShaundra Byrd was present (pages 6 through 45) in which I transcribed and the partial segment wherein I was present is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the



FELICIA A. NEWLAND, CSR